UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

Hon. Katherine S. Hayden Criminal No. 19-Cr-695

v.

18 U.S.C. § 201(b)(2)(A) and (C)

18 U.S.C. § 981(a)(1)(C)

SABOR GORDON

28 U.S.C. § 2461

INFORMATION

The defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges:

- 1. At all times relevant to this Information:
- Defendant SABOR GORDON was employed by the United States Postal a. Service ("USPS") as a mail carrier and technician, and was a public official within the meaning of 18 U.S.C. § 201(a)(1).
- Defendant SABOR GORDON was employed at a post office station in b. Bloomfield, New Jersey.
- 2. From in or about September 2017 to in or about May 2018, defendant SABOR GORDON received cash payments from Olagoke Araromi ("Araromi") and another individual ("Individual 1") in exchange for stealing credit cards and checkbooks from the mail that were sent by financial institutions to accountholders and for giving those stolen credit cards to Araromi and stolen credit cards and checkbooks to Individual 1.
- It was part of the scheme that, from in or about September 2017 to in or about 3. May 2018:

- a. defendant SABOR GORDON looked for certain types of envelopes and return addresses on envelopes that he came across while working at the postal station and delivering mail that likely contained credit cards and checkbooks;
- b. defendant SABOR GORDON met on multiple occasions with Araromi, in New Jersey, including in Bloomfield, to give the stolen credit cards that he removed from the mail to Araromi;
- c. defendant SABOR GORDON met on multiple occasions with Individual 1 in New Jersey, including in Bloomfield, to give the stolen checkbooks and credit cards that he removed from the mail to Individual 1; and
- d. defendant SABOR GORDON received cash from Araromi and Individual 1 for each stolen credit card he gave to Araromi and for each of the stolen checkbooks and credit cards he gave to Individual 1, totaling approximately \$5,000.
- 4. From in or about September 2017 to in or about May 2018, in Essex County, in the District of New Jersey, and elsewhere, defendant

SABOR GORDON,

being a public official, directly and indirectly, did corruptly demand, seek, receive, accept, and agree to receive and accept things of value, namely, cash, in return for being influenced in the performance of official acts and for being induced to do, and omit to do, acts in violation of his official duties.

In violation of Title 18, United States Code, Section 201(b)(2)(A) and (C).

FORFEITURE ALLEGATION

- 1. The allegations contained in all paragraphs of this Information are hereby realleged and incorporated by reference for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).
- 2. The United States hereby gives notice to defendant SABOR GORDON that, upon conviction of the bribery offense in violation of Title 18, United States Code, Section 201(b)(2)(A) and (C), charged in this Information, the United States will seek forfeiture, in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), of any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of such offense, including, but not limited to, \$5,000 in United States currency.
- 3. If by any act or omission of the defendant SABOR GORDON, any of the property subject to forfeiture described above:
 - a) cannot be located upon the exercise of due diligence;
 - b) has been transferred or sold to, or deposited with, a third party;
 - c) has been placed beyond the jurisdiction of the court;
 - d) has been substantially diminished in value; or
 - e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of defendant SABOR GORDON up to the value of the above-described forfeitable property.

CRAIG CARPENITO United States Attorney

CASE NUMBER: 19-

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INFORMATION FOR

18 U.S.C. § 201(b)(2)(A) and (C) 18 U.S.C. § 981(a)(1)(C) 28 U.S.C. § 2461(c)

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